



Eric Gonzalez  
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[INSERT NAME]  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME:** STEVEN LOPEZ

**MOS TAX:** [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**Disclosure # 1:**

[REDACTED]  
[REDACTED]  
[REDACTED] MOS  
LOPEZ, [REDACTED] TESTIFIED [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] JUSTICE GARY FOUND THAT MOS LOPEZ AND [REDACTED] "WERE NOT CREDIBLE IN  
PORTIONS OF THEIR TESTIMONY," [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Disclosure # 2:**

IN 2011, MOS LOPEZ TESTIFIED IN THE UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK, IN TWO SEPARATE PRE-TRIAL SUPPRESSION HEARINGS, FIRST IN A CASE BEFORE DISTRICT COURT JUDGE JOHN G. KOELTL, AND SECOND, IN A CASE BEFORE DISTRICT COURT JUDGE ROBERT SWEET. BOTH JUDGES FOUND THAT THE TESTIMONY GIVEN BY MOS LOPEZ IN THE RESPECTIVE HEARING WAS NOT CREDIBLE.

THE TRANSCRIPT OF JUDGE KOELTL'S ORAL DECISION IN UNITED STATES V. JAMES RUSSELL, 11-CR-0312 (JGK) (S.D.N.Y. NOV. 9, 2011), IS ATTACHED HERETO.

JUDGE SWEET'S DECISION IN UNITED STATES V. TYQUAN WILLIAMS, 2011 U.S. DIST. LEXIS 134352 (S.D.N.Y. NOV. 21, 2011), IS ATTACHED HERETO.

**Disclosure # 3:**

IN 2012, MOS LOPEZ READILY ADMITTED DURING A DEPARTMENTAL INVESTIGATION INTO THE FORMERLY WIDESPREAD PRACTICE OF "TICKET FIXING" THAT ON TWO OCCASIONS IN 2010, HE HAD MADE REQUESTS

OF FELLOW OFFICERS THAT A SUMMONS BE "TAKEN CARE OF."

AS A RESULT OF THE DEPARTMENTAL INVESTIGATION, THE FOLLOWING DEPARTMENTAL CHARGES WERE ISSUED AGAINST MOS LOPEZ:

1. SAID MOS STEVEN LOPEZ, WHILE ASSIGNED TO THE PATROL BOROUGH BRONX COMMAND, ON OR ABOUT AND BETWEEN JULY 12, 2010, AND AUGUST 9, 2010, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT SAID MOS ON TWO OCCASIONS REQUESTED THE ASSISTANCE OF ANOTHER MEMBER OF THE SERVICE TO PREVENT THE PROCESSING AND ADJUDICATION OF SUMMONSES ISSUED TO VARIOUS INDIVIDUALS.

ACTION TAKEN: ONE (1) YEAR DISMISSAL PROBATION, FORFEITURE OF TWENTY-FIVE (25) VACATION DAYS AND SUSPENSION FOR FIVE (5) DAYS.

THE NYPD ALSO ISSUED THE FOLLOWING DEPARTMENTAL ALLEGATIONS AGAINST MOS LOPEZ:

■ [REDACTED]

■ [REDACTED]

DISPOSITION: DISMISSED.

[REDACTED]

**Disclosure # 4:**

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S) AGAINST MOS ARISING OUT OF AN INCIDENT ON 06/08/2018:

ALLEGATION(S):

1. MEMOBOOK INCOMPLETE/ INACCURATE

CASE STATUS: CLOSED ON 09/18/2018

ACTION TAKEN: VERBAL INSTRUCTIONS

**Disclosure # 5:**

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

PLAINTIFF	DOCKET	COURT	FILED	DISPOSED	DISPOSITION
MARK DAVIS	14-CV-8352	E.D.N.Y.	10/20/2014	06/11/2015	Settlement
CURTIS STURDIVANT	301020/2015	Bronx Cty. Sup. Ct.	05/26/2015	06/10/2019	Settlement
CUAME NELSON	504911/2017	Kings Cty. Sup. Ct.	3-24-17	-	<i>Pending, next on 03/03/2020</i>
JAMES DIAZ	304408/2015	Bronx Cty. Sup. Ct.	12/07/2015	-	<i>Pending, next on 05/13/2020</i>
DAWRRY GARCIA	15-CV-5201	E.D.N.Y.	07/10/2015	03/03/2016	Settlement
RAMON HERNANDEZ	20756/2018	Bronx Cty. Sup. Ct.	02/07/2018	-	<i>Pending, next on 03/11/2020</i>

TROY ARCHIBALD	28182/2018	Bronx Cty. Sup. Ct.	07/18/2018	-	<i>Pending, next on 03/04/2020</i>
TAVIN BARRETT	18-CV-5522	E.D.N.Y.	06/20/2018	10/16/2019	-

**BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:**

**Disclosure # 6:**

CCRB CASE: 201308475

REPORT DATE: 09/12/2013

[REDACTED]  
[REDACTED]  
[REDACTED]

**Disclosure # 7:**

CCRB CASE: 201606580

REPORT DATE: 08/01/2016

INCIDENT DATE: 07/30/2016

CCRB SUBSTANTIATED ALLEGATION(S):

1. ABUSE - REFUSAL TO PROVIDE NAME/SHIELD NUMBER

NYPD DISPOSITION: INSTRUCTIONS

**Disclosure # 8:**

CCRB CASE: 201704156

REPORT DATE: 05/26/2017

[REDACTED]  
[REDACTED]  
[REDACTED]

**Disclosure # 9: (PENDING)**

CCRB CASE: 201909241

REPORT DATE: 10/23/2019

[REDACTED]  
PENDING CCRB ALLEGATION(S):  
[REDACTED]

Eric Gonzalez  
District Attorney  
Kings County

**SEE ATTACHMENTS BELOW.**